

Tim Hodgkinson
Middlesbrough Council
Licensing Team

Sent by email

28/04/22

Dear Sir

Re Representation against the application to vary converted casino premises licence by Double Diamond Gaming Limited at Aintree Oval Teesside Park Middlesbrough to premises at 22 Newport Road Middlesbrough.

The Director of Public Health (through the Public Protection Service) is making a representation in relation to the application to vary the converted casino premises licence by Double Diamond Gaming Limited at Aintree Oval Teesside Park Middlesbrough to premises at 22 Newport Road Middlesbrough.

The Director of Public Health holds the statutory functions in relation to minimising or preventing risk of harm to human health, in accordance with section 157(g).

We do not consider the above application to vary the converted casino licence to another premises at 22 Newport Road to be a technical matter of “parking” the licence with a condition not to operate until a later date when further applications will be made to vary to extend the area and then transfer to operators who hold the licence for the Adult Gaming Centre. We consider this application is to bring a casino to a premises on Newport Road which is a location in the town centre, within, next to or adjoining an adult gaming centre. In addition, this premises may operate for 24 hours by applying to remove the default condition.

This application does not consider the impact of locating a casino with its machine entitlement alongside a large Adult Gaming Centre, with its own gaming machine entitlement. It is our opinion that this proposed application, regardless of this stage being stated as a paper exercise, will result in relocating a casino to 22 Newport Road to a town centre location, which is also the centre of the night economy. The premise at 22 Newport Road is sited in a prominent position for both daytime and night time activity. No risk assessment or detailed information about how the casino will be delivered has been provided in order for the impact to be fully considered. In addition, we also understand that a further application will be made for the sale of alcohol and we consider that the proposed application would increase access to gambling for individuals under the influence of alcohol.

We recognise the extensive harms that problem gambling encompasses:

- Potential co-morbidities eg. anxiety & depression, substance misuse
- Medical consequences eg. insomnia, CVD, stomach problems
- Social consequences eg. relationships, neglect, bankruptcy
- Burden on public purse eg. health, welfare, housing, criminal justice

It has also been found that:


- For male gamblers, alcohol consumption is heavier in those classified as problem or at risk gamblers than those classified as non-problem or non-at-risk gamblers.
- Problem gamblers are more likely to be smokers and they are also more likely to be heavy smokers
- For self-reported anxiety and/or depression; 47% of problem gamblers said they are moderately or severely anxious or depressed versus 20% of non-problem or non-gamblers.
- For diagnosed disorders, 11% of problem gamblers have a diagnosed mental health disorder versus 5% of non-problem or non-gamblers.

The ward where the casino is to be located is one of the most deprived wards in Middlesbrough and also nationally. Central ward also has the highest reported crime and antisocial behaviour in the town. The location of the casino at 22 Newport Road is in an area where there is a high density of licensed premises and is subject to a Cumulative Impact Policy under the Licensing Act (currently under review.)

Considering the cumulative and correlative risks associated with problem gambling, together with the increased vulnerabilities for alcohol and gambling related harm in the Middlesbrough population related to the local demographic, high levels of deprivation and co-morbidities, and the absence of a risk assessment or detailed information about how the casino will be delivered, the Director of Public Health objects to this application.

Further additional evidence will be submitted in due course to support this representation.

Yours faithfully,

A handwritten signature in black ink that reads "JA Hedgley". The signature is written in a cursive style and is positioned above a horizontal line.

Judith Hedgley
Head of Public Protection
(on behalf of the Director of Public Health)